

**LOCAL BANKRUPTCY FORM 9013-3**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

SHERRY L. STIPSAK  
aka SINCERELY YOURS PERSONAL CARE  
BOARDING HOME I  
aka SINCERELY YOURS PERSONAL CARE  
BOARDING HOME II

**Debtor(s)**

FIRST NATIONAL BANK OF PA, AS  
SUCCESSORY BY MERGER TO METRO  
BANK

**Plaintiff(s)/Movant(s)**

**vs.**

NOBEL OPPORTUNITY FUND, II, LP,  
GIRL SCOUTS IN THE HEART OF PA  
YORK COUNTY TAX CLAIM BUREAU  
YORK TRADITIONS BANK,  
CHARLES J. DEHART, III, TRUSTEE

**Defendant(s)/Respondent(s)**

**CHAPTER** 13

**CASE NO.** 1 - 15 .bk- 03281RNO

**ADVERSARY NO.**     -     ap-             
(if applicable)

**Nature of Proceeding:** Motion for an

Order enforcing order approving sale

**Document #:** 144, 148, 150 & 154

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

Need additional 45 days for witnesses to become available.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 12/5/17

/s/Steven M. Carr

Attorney for Nobel Opportunity II, LP

Name: Steven M. Carr, Esquire

Phone Number: 717-843-8968

<sup>1</sup> No alterations or interlineations of this document are permitted.